

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a BRAZOS
LICENSING AND DEVELOPMENT,

Plaintiff,

v.

DELL TECHNOLOGIES INC., DELL INC.,
EMC CORPORATION,

Defendants.

Case No. 6:20-cv-00482-ADA

JURY TRIAL DEMANDED

LETTERS OF REQUEST FOR FOREIGN DISCOVERY FROM GERMANY

Defendants', Dell Technologies Inc., Dell Inc., and EMC Corporation, (collectively "Defendants"), seek foreign discovery from third party witnesses residing in Germany. Defendants have attached Appendices with Letters of Request which include Document Requests and Deposition Topics. The chart below outlines the name of each witness Defendants seek foreign discovery from, the relevant case number, and the Patent at issue.

Appx.	Name of Witness Entity	Relevance of Witness/Entity	Case No.	U.S. Pat. No.
A	Christopher Öchsner	Named Inventor	6:20-cv-00482	7,424,020
B	Emmanuelle Wetzel	Executed the assignment of the patent	6:20-cv-00482	7,424,020

Defendants respectfully request that the Court execute the Letters of Request attached as Appendices A–B. Defendants further request that, after the Court has signed the Letters of Request, the Clerk of this Court authenticate the Court's signature under the seal of this Court, and return the original signed and sealed executed Letters, and two certified copies of the signed and sealed executed Letters, to Defendants' counsel, Barry K. Shelton, for delivery to the proper authority.

Plaintiff, WSOU Investments, LLC d/b/a Brazos Licensing and Development, indicated that it reserves the right to serve its own foreign discovery in the future.

Dated: November 6, 2020

By: /s/ Barry K. Shelton

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Attorneys for Defendants

CERTIFICATE OF SERVICE

The undersigned certifies that on November 6, 2020, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(b)(1).

/s/ Barry K. Shelton
Barry K. Shelton